

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

PATRICK BRADY, et al.,

Plaintiffs,

v.

AIR LINE PILOTS
ASSOCIATION,
INTERNATIONAL,

Defendant.

Civil Action No. 02-2917 (JEI)

**DEFENDANT ALPA'S NOTICE OF MOTIONS
TO EXCLUDE THE TESTIMONY OF PLAINTIFFS' EXPERTS,
AND FOR SUMMARY JUDGMENT**

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PLEASE TAKE NOTICE that pursuant to the August 8, 2013 Stipulation and Order as to Briefing Schedule for *Daubert* and Summary Judgment Motions, on October 7, 2013, or as soon thereafter as counsel may be heard, Defendant Air Line Pilots Association, International (“ALPA”) shall move before the Honorable Joseph E. Irenas, Sr. U.S.D.J., for an Order granting Defendant’s (i) Motion to Exclude the Testimony of Plaintiffs’ Experts and (ii) Motion for Summary Judgment.

In support of these Motions, ALPA will rely on the accompanying Memorandum of Law, Statement of Material Facts Not in Dispute, and Declaration of Daniel J. Toal, with attached Exhibits 1 through 82. A proposed form of Order and a Certificate of Service are also enclosed.

Oral argument is requested if the Motion for Summary Judgment is opposed. Oral argument and an evidentiary hearing are requested if the Motion to Exclude the Testimony of Plaintiffs’ Experts is opposed.

Dated: Haddonfield, NJ
August 22, 2013

Respectfully submitted,

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- and -

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